M&E Metcalf & Eddy
An Air & Water Technologies Company

December 2, 1991

Mr. Mike Valentino
RCRA Activities Branch
United States Environmental Protection Agency
Mail Stop HRE-8J
77 West Jackson
Chicago, IL 60604

RE: Stanley Tools Site Visit
Work Assignment No. RO5011
November 14, 1991

Dear Mr. Valentino:

Attached please find a summary and photographs of the site visit to the Stanley Tools Facility on November 14, 1991. The site visit was conducted by Dames & Moore and a Stanley Tools representative. U.S. EPA, MDNR, and Metcalf & Eddy personnel were also present.

If you have any questions or comments, please call me at (614) 890-5501.

Sincerely,

METCALF & EDDY, INC.

Christopher L. Bowers, P.E.
Contractor Project Manager

CLB/sac

Enclosure

2800 Corporate Exchange Drive, Suite 250, Columbus, OH 43231
614-890-5501 FAX 614-890-7421

AWT

Stanley Tools Site Visit

Personnel on-site were:

Name	Affiliation
Mike Valentino	U.S. EPA
David Slayton	MDNR
Christopher Bowers	M&E
Todd Aebie	M&E
Karl VanKeuren	Dames & Moore
William Guerrera	Stanley Tools

The site visit was conducted at the Stanley Tools Facility in Fowlerville, MI on November 14, 1991. The site visit began approximately 11:30 a.m. and ended at approximately 1:00 p.m. The site visit was conducted by Karl VanKeuren of Dames & Moore and by William Guerrara of Stanley Tools. The site visit was conducted by walking from solid waste management unit (SWMU) to unit to familiarize everyone with the site. At each unit, Dames & Moore explained the history, and work completed on it and answered questions. Mr. David Slayton, MDNR was very helpful in explaining the site since he has been involved with the facility for the last 7 years.

Unit A was the first SWMU visited. The unit is square and approximately 100′ by 125′ in size. The unit has been excavated and contains water, which is stated to be ground water, as the level fluctuates with ground water levels in nearby wells. Unit A had vegetation on the banks and growth of vegetation in the lagoon itself. No visible contamination was noted. Along the southern side of Unit A is SWMU E. This SWMU is partially covered by Unit A. Unit E is monitored by wells which also monitor Unit A. Additional work needs to be performed to verify clean closure of this unit. Waste may remain below the depth excavated.

The plant's former outfall and stream gauge were viewed. Dames & Moore has used this area for surface water and sediment sampling. Also, general sediment and surface water sample locations for the Red Cedar River were identified.

Unit F was visited next. The unit contains gross contamination as green sludge was visible. The oblong shaped berms were made up of the sludge and the surrounding soil. The unit is located next to the Red Cedar River and greenish sludge is present between the berms and the river's banks. Unit F has monitoring wells along the western side, between it and the river, to monitor ground water.

Unit J, the former Wastewater Treatment Plant is located in the center of the site. The treatment plant has been cleaned and material removed, but an insufficient amount of investigation has been done to characterize this unit. Additional work is needed near the cyanide tanks (which contain rain and possible wash water) on the southern portion of the treatment plant. Clean closure of this unit requires further work to confirm conditions.

Units B & C, located on the southwestern portion of the property, are old effluent and kerosene settling ponds. These areas have been backfilled and are covered with sporadic vegetation. The boundaries of the two units are not fully defined, and the area shows signs of repeated excavation and backfilling.

Units K & L had underground storage tanks of fuel oil. these tanks have been removed, and the areas backfilled. No visible contamination is present at these sites.

Unit G is located north of the Stanley Plant and it received sludge which was "Chem-fixed." The unit has greenish sludge remaining. No prominent berms are visible, but the area has been slightly excavated to handle the sludge. Sludge is visible as mounded areas located in the unit.

Unit H is a sludge spill area between unit A and unit G. The size is approximately 10' x 10' and the greenish sludge is visible. The spill occurred while transferring sludge from Unit A to Unit G.

Unit I is the southern drainage ditch between the Stanley Property and the railroad right-of-way. Unit I was a point of effluent discharge for the facility. Greenish sludge is visible in the drainage ditch. Presently, the drainage ditch is overgrown with vegetation. In the past, samples were collected from the ditch to characterize any contamination present.

The site visit was very beneficial in understanding the facilities processes, past disposal practices and in determining the appropriate means of conducting the RFI work. Metcalf & Eddy took site photographs of the units to detail the site for future reference. The photographs and a brief description are included in the photolog, Exhibit A.

EXHIBIT A

PHOTOLOG

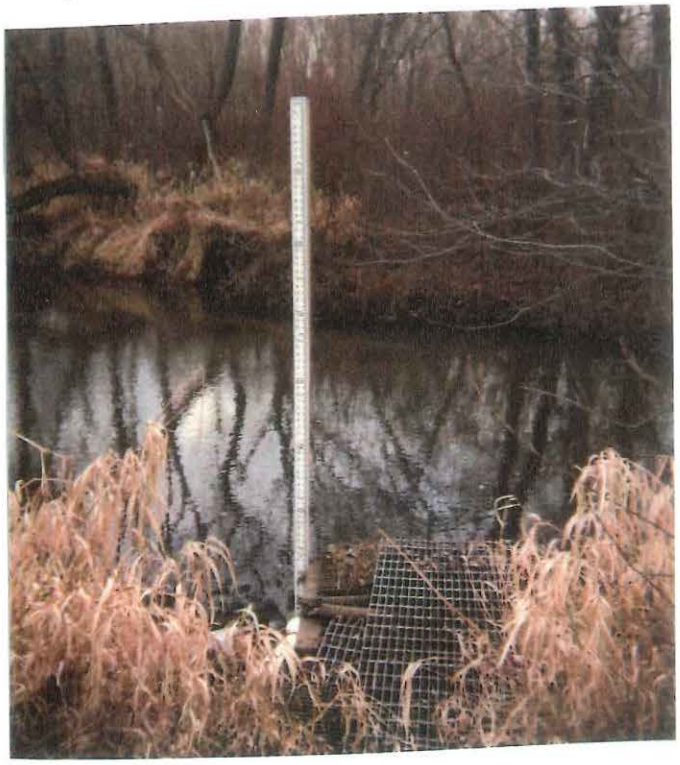
PHOTOGRAPH 1: Stanley Tools
Unit A (looking Northerly)

PHOTOGRAPH 2: Stanley Tools
Unit A (looking Northerly)

PHOTOGRAPH 3: Stanley Tools
Unit A (looking Northerly)

PHOTOGRAPH 4: Stanley Tools
Unit A (looking Northeasterly)

PHOTOGRAPH 5: Stanley Tools
Southeast Berm of Unit A
(looking Easterly)



PHOTOGRAPH 6: Stanley Tools
Staff Guage at Red Cedar River
At effluent discharge location
(looking Westerly)

PHOTOGRAPH 7: Stanley Tools
Red Cedar River
Looking downstream (northerly) from railroad bridge
Note Stanley Wastewater Plant in background

PHOTOGRAPH 8: Stanley Tools
Unit F (looking Northerly)

PHOTOGRAPH 9: Stanley Tools
Unit F (looking Northerly)

PHOTOGRAPH 10: Stanley Tools
Unit A (looking Easterly)
Note the Stanley Plant in background

PHOTOGRAPH 11: Stanley Tools
Unit B Wells MW-B1 and MW-B2
Suspected location of buried drums

PHOTOGRAPH 12: Stanley Tools
Unit J
Wastewater Treatment Plant
(looking Northerly)

PHOTOGRAPH 13: Stanley Tools
Unit J
Wastewater Treatment Plant
(looking Northerly)

PHOTOGRAPH 14: Stanley Tools
Unit K
Former Underground Tank Area
(looking Westerly)

PHOTOGRAPH 15: Stanley Tools
Southern Portion of the Plant
(looking Easterly)

PHOTOGRAPH 16: Stanley Tools
Southeast corner of the Plant
(looking Northerly)

PHOTOGRAPH 17: Stanley Tools
Plant Entrance and Parking Lot
(looking Southwesterly)

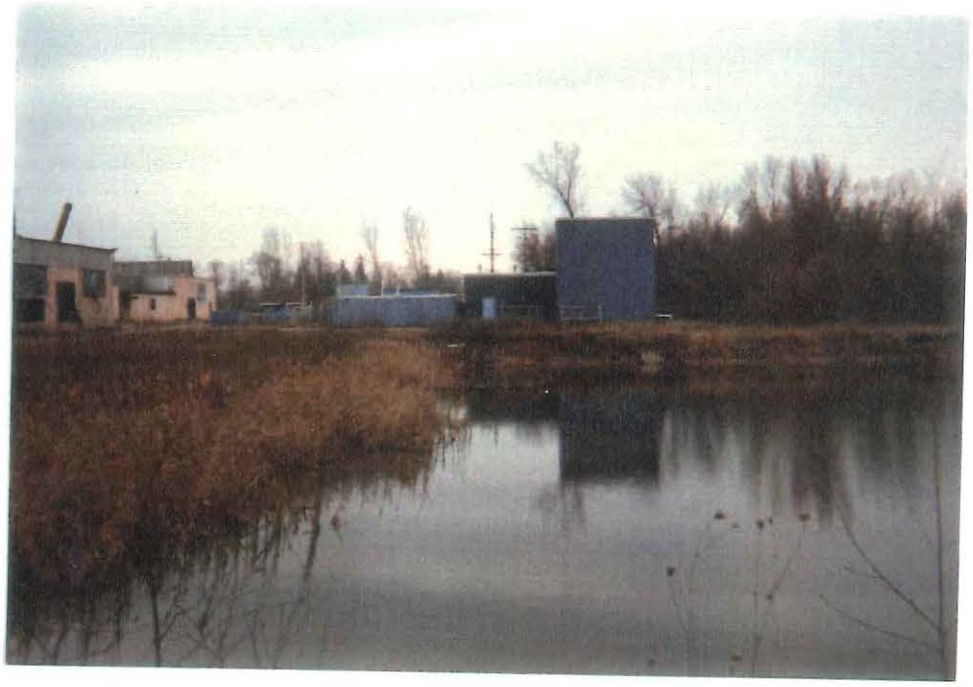
PHOTOGRAPH 18: Stanley Tools
Unit G - Well MW-G4
(looking Westerly)

PHOTOGRAPH 19: Stanley Tools
Unit G (looking Northeasterly)
Note greenish sludge pile in left center

PHOTOGRAPH 20: Stanley Tools
Northern Drainage Ditch
(looking Westerly)

PHOTOGRAPH 21: Stanley Tools
Storm Sewer Outfall in Northern Drainage Ditch
(looking Easterly)
Ditch from Unit G enters from North at this point

PHOTOGRAPH 22: Stanley Tools
Unit H (looking Northerly)
Note greenish sludge in center



PHOTOGRAPH 23: Stanley Tools
Site View, Unit A, Wasterwater Plant
(looking Southerly)

PHOTOGRAPH 24: Stanley Tools
Site View, Unit A, Wastewater Plant
(looking Southeasterly)

3/22/86

GENERAL INFORMATION

Facility I.D. Number: MID 099 124 299

Facility Name: Stanley Tools, Div. of the Stanley Works

Facility Contact (Name and Title): Albert Stock, Plant Engineer

Facility Contact (Phone): 517/223-9154

Facility Mailing Address:

(Street) 425 Frank Street

(City) Fowlerville

(State) Michigan (Zip) 48836

Facility Location:

(Street) 425 Frank Street

(City) Fowlerville

(County) Livingston

(State) Michigan (Zip) 48836

Site ID Number MID 099 124 299

SUMMARY REPORT

Facility Name: Stanley Tools, Div. of the Stanley Works

PART A APPLICATION STATUS

Submitted	[X]	Yes	[ ]	No
Additions	[ ]	Yes	[X]	No
Deletions	[X]	Yes	[ ]	No

3007 U.S. EPA REQUEST LETTER

Received	[X]	Yes	[ ]	No
Response	[X]	Yes	[ ]	No

LOIS CERTIFICATION

Submitted	[ ]	Yes	[X]	No

CLOSURE PLAN

(Place number of waste management units in the appropriate box)

Submitted	[2]	Yes	[ ]	No
Approved	[2]	Yes	[ ]	No
Implemented	[2]	Yes	[ ]	No
Certified Closure	[ ]	Yes	[2]	No

Site ID Number MID 099 124 299

SUMMARY REPORT (Continued)

CURRENT RCRA ACTIVITIES

Waste Generator	☐	Yes	☒	No
Waste Storage	☐	Yes	☒	No
Waste Land Disposal	☐	Yes	☒	No
Waste Transporter	☐	Yes	☒	No
Land-Based Waste Treatment	☐	Yes	☒	No
Waste Treatment other than Land Disposal	☐	Yes	☒	No

Additional Remarks: _____

NOTES, OTHER OBSERVATIONS AND RECOMMENDATIONS

The plant's production or manufacturing facilities have been shut down. Stanley laid off all the production workers as of February 15, 1986, and the remaining employees are involved in the details of closing the plant. At the time of the inspection, the factory was almost empty and very little production equipment was observed. The wastewater treatment plant was also shut down and, according to Mr. Albert Stock, the facility is planning to remove some of this equipment before the facility is sold.

The surface impoundments that were used in the wastewater treatment process scheme are being closed as RCRA waste management units. The closure plan has been submitted and was approved by U.S. EPA on September 27, 1985 (R-5).

In response to the LOIS inspection, Ms. Delia M. Christensen of Stanley Works wrote to U.S. EPA on April 14, 1986, stating that the surface impoundments went into closure on October 7 (R(7)). She further stated that Mr. Richard Traub of U.S. EPA Region 5 informed Stanley Works that it did not have to respond to the 3007 letter regarding the LOIS certification, since the facility's regulated units were already in closure.

Site ID Number MID 099 124 299

LIST OF SITE CONTACTS

	Name	Title	Telephone
1.	Albert Stock	Plant Engineer	517/223-9154
2.	Delia Christensen	Chief Chemist, Env. Science for Stanley Works	203/225-5111 ext. 5211
3.			
4.			
5.			
6.			
7.			

Site ID Number MID 099 124 299

LIST OF SITE DOCUMENTS

1. Title Part A Application

   Author Richard Krug, Stanley Tools

   Date November 9, 1984 Number of Pages 7

2. Title Letter to Edith Ardiente, U.S. EPA, Re: GW Assessment Report

   Author Alan Howard, Michigan DNR

   Date March 25, 1985 Number of Pages 4

3. Title Request for Public Comments Regarding Solid Waste Management and Related Environmental Releases

   Author U.S. EPA Region 5

   Date September 11, 1985 Number of Pages 1

4. Title Letter to Albert Stock, Stanley Tools, Re: U.S. EPA Warning

   Author William Muno, U.S. EPA Region 5

   Date September 18, 1985 Number of Pages 3

5. Title Letter to Delia Christensen, Stanley Tools, Re: Closure Plan

   Author Basil Constantelos, U.S. EPA Region 5

   Date September 27, 1985 Number of Pages 2

Site ID Number MID 099 124 299

LIST OF SITE DOCUMENTS

6. Title Letter to William Muno, U.S. EPA, Re: Letter of Warning

   Author Delia Christensen, The Stanley Works

   Date October 18, 1985 Number of Pages 3

7. Title Letter to U.S. EPA, Re: LOIS Notification

   Author Delia Christensen, The Stanley Works

   Date April 14, 1986 Number of Pages 1

8. Title _____

   Author _____

   Date _____ Number of Pages _____

9. Title _____

   Author _____

   Date _____ Number of Pages _____

10. Title _____

    Author _____

    Date _____ Number of Pages _____

Site ID Number MID 099 124 299

LIST OF INSPECTED WASTE MANAGEMENT UNITS

U.S. EPA Process Code/Unit	Field Observations
1. Surface Impoundments	According to Albert Stock, the closure plan is being implemented and the storage lagoon earthen divider walls described in the Part A application have been removed. At the time of inspection, the impoundment was filled with rain water and runoff. The site is inactive with regards to RCRA activity, and the facility is in the process of closing the site.

CODES FOR COMPLETING QUESTIONNAIRE

INSTRUCTIONS:

All questions must be answered with at least one of the codes listed below. Questions answered with an "I" (insufficient information) require further explanation. In these cases, or whenever additional information needs to be reported, write notes in the "Remarks" area provided at the bottom of each questionnaire page or on a separate sheet of paper (extra sheets of paper should be numbered and inserted into the work sheets using the number of the preceding page and a lower case letter -- for example, p. H-5a). Also note that when parentheses are used around a blank, the information should be filled in before the interview.

Codes for Answering Questions	Usage
Y	Yes
N	No
NA	Question not applicable
I	Insufficient information; need explanation

Process Codes	Usage
S01	Container storage
S02	Tank storage
S03	Waste pile storage
S04	Surface impoundment storage
D79	Injection well disposal
D80	Landfill disposal
D81	Land application disposal
D83	Surface impoundment disposal
T01	Tank treatment
T02	Surface impoundment treatment

Process Codes	Usage
T03	Incineration
T04	Other physical, chemical, thermal, or biological treatment processes not using tanks, surface impoundments, or incinerators

Closure Status Code	Usage
CPS	Closure Plan has been submitted (obtain a copy of the plan or transmittal letter)
CPA	Closure Plan has been examined and approved by the responsible agency (obtain a copy of the approval letter)
CPI	Approved Closure Plan submitted to the EPA is now being implemented
CC	The facility has completed closure in a manner acceptable to the responsible agency and in accordance with the Closure Plan (obtain a copy of the certification letter)

Note: Anytime a closure status code is used, a verification code is required.

Verification Code	Usage
F	Verified by field inspection
R(#)	Verified by review of a document; use List of Documents (see p.F-1) to supply document number in parentheses
I(#)	Verified by interview; use List of Site Contacts (see p.E-1) to supply interviewee number in parentheses

Example No. 1: Y. R(2); the answer to the question is affirmative and was verified by reviewing site document number 2.

Example No. 2: N. I(1); the answer to the question is negative and was verified by interviewee number 1.

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

INSPECTION QUESTIONNAIRE

ANSWER AND VERIFICATION CODE

1) Is this facility presently owned or operated by (owner-Stanley Tools, Div. of the Stanley Works/operator-Same)? Y, I (1)

Yes - Skip to question 3.

No - Write the name of the present owner below and continue to the next question.

Name of the present owner _____

_____

2) Was a revised Part A application sent to the U.S. EPA 90 days prior to the change of ownership/operator? NA

Yes - In the space provided below, write the name of the person who signed the Part A owner/operator certification and the date signed (this information is found on page(s) 4 of 5 of the application). Skip to question 4.

No - Skip to question 4.

Owner Certification was signed by _____
on ___-___-___.

Operator Certification was signed by _____
on ___-___-___.

3) Is the most recent Part A application in your possession certified by (Richard F. Krug) and signed on (11/9/84)? Y, I (1)

Yes - Continue to the next question.

No - In the space provided below, write the name of the person who certified the most recent Part A and the date signed. Obtain a copy of the most recent Part A, then continue to the next question.

Owner Certification was signed by _____
on ___-___-___.

Operator Certification was signed by _____
on ___-___-___.

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

4) Is hazardous waste presently generated, disposed of, stored, treated, or received at this facility? N, I (1)

Yes - Continue to next question.

No - In the space provided below, list the status of any closed hazardous waste operations, obtain a copy of all pertinent closure documents, and visit the closed units; then skip to question 16.

General Description of Unit Process	U.S.EPA Process Code	Closure Status
Surface Impoundments	(S04)	CPI, R(5)
_____	(____)	_____
_____	(____)	_____
_____	(____)	_____
_____	(____)	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Remarks: Plant manufacturing operations were shut down as of February 15, 1986. Closure plan implementation began on October 7, 1985, and was not completed as of March 25, 1986. Reference Document No. 5 for Closure Plan approval from the U.S. EPA, and the PRC field observation (on page G-1) document partial implementation of the closure plan.

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

5) Does this facility have any inactive landfills, surface impoundments, waste piles, or land treatment sites? NA

Yes - In the space provided below, list the status of any inactive hazardous waste operation, obtain a copy of all pertinent closure documents, and visit the closed units.

No - Continue to the next question.

General Description of Unit Process	U.S.EPA Process Code	Closure Status

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

6) Is hazardous waste being generated at this facility? NA

Yes - Continue to the next question.

No - Continue to the next question.

Remarks: _____

_____

_____

7) In the past, was hazardous waste other than those listed in Question No. 6 generated at this facility? NA

Yes - Continue to next question.

No - Continue to next question

Remarks: _____

_____

_____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

8) Is hazardous waste being stored in surface impoundments (S04) or waste piles (S03) at this facility? NA

Yes - In the space provided below, list storage unit currently being used and EPA process codes; continue to the next question.

No - Continue to the next question.

General Description of Waste Storage Unit	EPA Process Code

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

9) In the past, was hazardous waste stored in surface impoundments (S04) or waste piles (S03) other than those listed in Question No. 8 at this facility? NA

Yes - In the space provided below, list inactive storage waste units, EPA process codes, and closure status. Obtain pertinent closure documents and inspect storage units. Continue to the next question.

No - Continue to the next question.

General Description of Waste Storage Unit	U.S.EPA Process Code	Closure Status

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

10) Is hazardous waste being treated in surface impoundments (T02) at this facility? NA

Yes - In the space provided below, list the active surface impoundments and indicate whether or not the end product is considered hazardous by the facility. Continue to the next question.

No - Continue to the next question.

Active Impoundments	Hazardous End Product (Yes or No)

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

11) In the past, was hazardous waste treated in surface impoundments (T02) at this facility other than those listed in Question No. 10? NA

Yes - Complete the information requested below; list the inactive surface impoundments and indicate whether or not the end product is considered hazardous by the facility; obtain pertinent closure documents; and inspect the closed units. Continue to next question.

No - Continue to next question.

Inactive Impoundments	Hazardous End Product (Yes or No)	Closure Status

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

12) Are hazardous wastes being shipped from this site? NA

Yes - Complete the information requested below; obtain a copy of the first manifest after the closure of the land-based waste management unit(s) (if available); skip to question 14.

No - Continue to the next question.

Type of Wastes	First Shipping Date	Manifest Availability (Yes or No)

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

13) In the past, was hazardous waste other than those listed in Question No. 12 shipped from this site? NA

Yes - Complete the information requested below; obtain a copy of the first manifest after closure of the land-based waste management unit(s) and the last manifest (if available); and continue to the next question.

No - Continue to the next question.

Type of Wastes	First Shipping Date	Last Shipping Date	Manifest Availability (Yes or No)

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

14) Is hazardous waste being disposed of in landfills (D80), disposed of in surface impoundments (D83), or being land applied (D81) at this facility? NA

Yes - In the space provided below, list the active disposal units and EPA process code; continue to the next question.

No - Continue to the next question.

Active Disposal Units	U.S. EPA Process Code

Remarks: _____

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

16) Did this facility submit a Part B application? Y, I (2)

Yes - Continue to Next Question
No - Continue to Next Question

17) Is this facility aware of the loss of interim status (LOIS) provision? Y, I (2)

Yes - Skip to question 20.

No - Briefly explain what the LOIS provision provides and how it applies to this facility, then continue to the next question.

18) Did this facility receive a 3007 request letter from the U.S. EPA? (Show an example of the request letter) Y, I (2)

Yes - Continue to the next question.

No - No more questions

19) Did this facility respond to this request letter? Y, I (2)

Yes - Obtain a copy of the response. No more questions.

No - No more questions.

20) Did this facility submit a LOIS certification? N, I (2)

Yes - Obtain a copy of the certification and transmittal letters, no more questions required.

No - Back up to question 18.

Remarks: On March 25, 1986, John Oster from PRC phoned Delia Christensen to obtain answers for questions 16 through 20. Mrs. Christensen said that she had responded to the 3007 letter; however, she could not locate a copy of the letter. Because she could not locate the letter, she wrote another reponse letter to U.S. response letter to U.S. EPA on April 14, 1986 (R(7)).

PRC Inspector(s): John Oster and Shin Ahn RCRA Site I.D. MID 099 124 299
Inspection Date: March 25, 1986

15) In the past, was hazardous waste land applied (D81) or disposed of in landfills (D80), or in surface impoundments (D83), other than those listed in Question No. 14, at this facility? NA

Yes - In the space below, list the inactive (closed) disposal units, U.S. EPA process codes and closure status. Obtain pertinent closure documents and inspect the closed units; continue to the next question.

No - Continue to the next question.

Inactive Disposal Units	U.S. EPA Process Code	Closure Status

Remarks: _____

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

October 17, 1985

Edith M. Ardiente, P.E.
Chief, Technical Services Section
U.S. EPA Region 5, 5HS-13
230 South Dearborn Street
Chicago, Illinios 60604

Re: Stanley Tools
MID 099 124 299

Dear Ms. Ardiente:

As per our co-operative agreement I have completed a Facility Management Plan for the above referenced facility. Attached is the FMP.

If you have any questions concerning this matter please contact me.

Sincerely,

James D. Roberts

James D. Roberts
Environmental Engineer
Technical Services Section
Hazardous Waste Division
517/373-2730

Attachment
cc: K. Burda/C&E File
J. Bohunsky/L. Vahovick, HWD
M. Murphy, U.S. EPA Region 5
R. Traub, U.S. EPA Region 5

Facility Management Plan
Stanley Tools
MID 099 124 299

A Part A application was received by the U.S. EPA on June 9, 1981, after Stanley Works purchased the facility from Hoover Universal.

The company is a major manufacturer of builders' hardware, hand tools and fabricated metal products. The facility is now a unit within the Hand Tools Division involved in the fabrication, finishing and plating of zinc die casings. Waste streams generated at the site are F006, F007, F009, D007 and D002. Wastewaters are treated on site and discharged to the Red Cedar River through a NPDES permit.

The Part B for the company was due on July 15, 1984. An extension for submitting information on the structural integrity of the dikes and impoundments was granted until September 28, 1984. A notice of deficiency was sent to company on September 13, 1984. A notice of deficiency was sent to the company on December 5, 1984, for the information on the dike and impoundment structural integrity. The company has withdrawn its Part B application and will be going through closure in lieu of a Part B.

EPA "Corrective Action Requirements for 1984 RCRA Amendments" letter was sent to Stanley Tools on April 23, 1985. This letter is for certification of prior releases. The company submitted the checklist on May 13, 1985, with the remainder of the form promised to be submitted May 24, 1985. To date the MDNR has not received the additional information.

Environmental Significance

The facility is located in a rural community along the Red Cedar River.

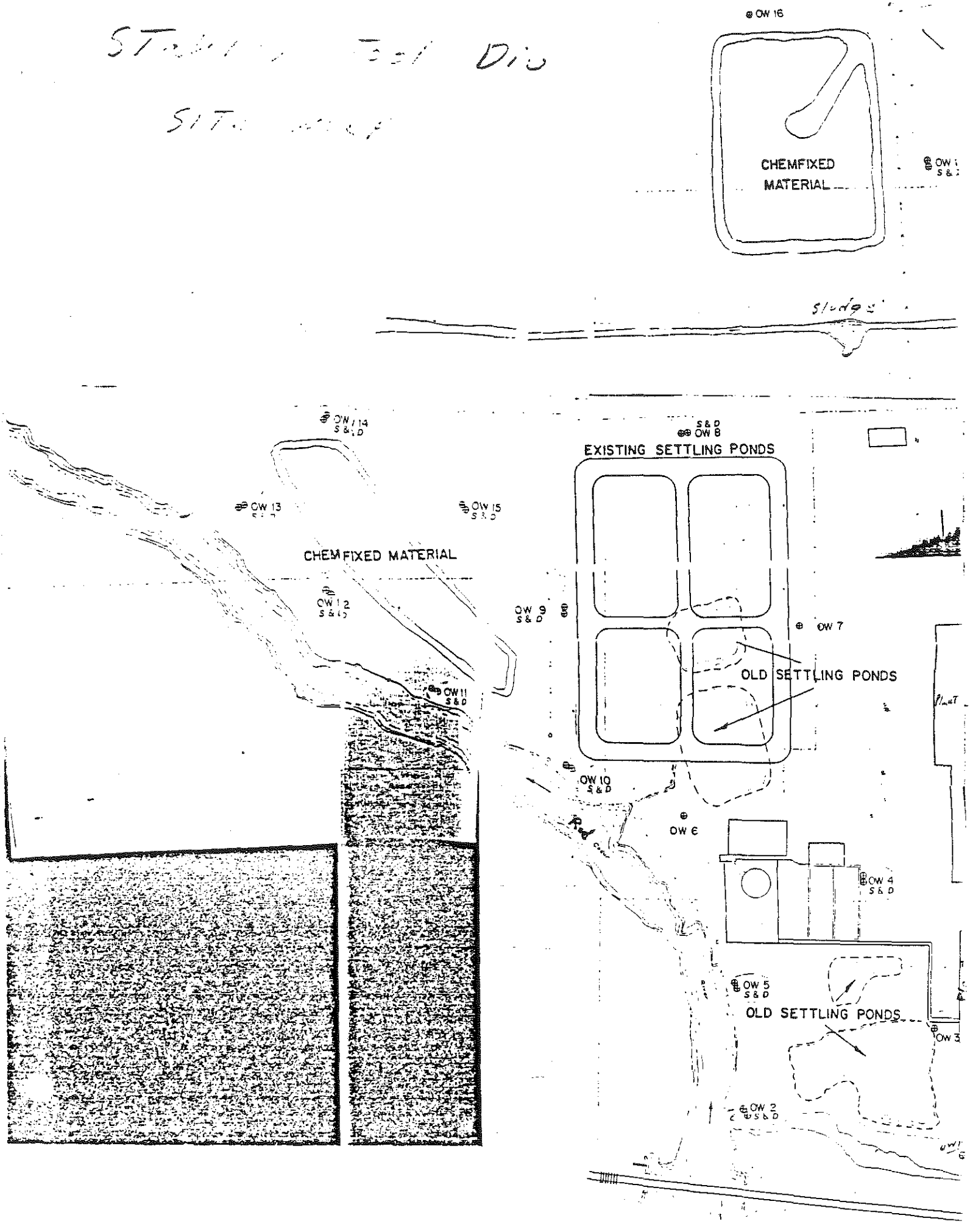
During February of 1985 Stanley Tools submitted a Groundwater Assessment Report to the U.S. EPA and MDNR. The report was reviewed by Dave Slayton, of the MDNR, and was found to be very inadequate. The deficiencies were noted in a letter to the EPA dated March 25, 1985. Subsequently the EPA sent the company a letter of warning concerning the Groundwater Assessment Report on September 18, 1985. The facility must address the deficiencies within 30 days.

Based on inspections and information submitted by the company there are four areas of concern. They are as follows:

1. The company currently operates four unlined settling lagoons which contain metal hydroxide sludges from their current industrial activities. The lagoons, which are in series, are the settling process area after the wastes have gone through pretreatment. The final effluent is released to the Red Cedar River through a NPDES permitted outfall. The company is in the process of going through closure for these lagoons.

STUDY AREA

SITE MAP



2. Prior to the existing lagoons the facility operated 4 unlined settling lagoons on site. The contaminated soils have been excavated and removed from the site but groundwater monitoring has shown contamination of the facility by heavy metals. A remedial action plan for cleaning up the groundwater must be designed and implemented.

3. Sludges from the old settling lagoons were treated by a chem-fix process (sludges were treated to a solid state) and placed on-site. In his September 26, 1985 memo, Leroy Vahovick stated that the chem-fix site on the northern most location (near observation well 17) has been removed but another location near the Red Cedar River has not. Since nothing in our files exists that states either area has been cleaned, an assessment should be made as to the amount of chem-fix material at the facility and what remedial actions should be conducted.

4. According to the September 26, 1985 memo by Leroy Vahovick, he states that on September 16, 1985 he observed a metal hydroxide sludge pile outside of the present lagoon fence line. Apparently this has been there for several years and should be removed of and disposed at a properly licensed facility.

Comments and Concerns

Most of the concerns from the MDNR can be answered by a properly conducted groundwater and site assessment program. Groundwater contamination has been documented at the site and the company should be designing a remedial action program, including monitoring wells at all existing and closed land disposal units, for the all releases to the soil and groundwater. Soil borings should be conducted at all of the chem-fix, sludge pile, and old lagoon sites to ensure that the wastes/contaminated soils have been removed or to determine the extent of contamination.

PASI?

Yes good idea

The assessment and remedial action program can be implemented through the corrective action procedures of the RCRA 1984 amendments concerning prior releases. The company is presently going through closure of the existing lagoons and the the corrective actions for the prior releases may be appropriate to address at the same time.

MICHIG DEPARTMENT OF NATURAL R OURCES

INTEROFFICE COMMUNICATION

September 26, 1985

TO: James Roberts, Technical Services Section, Hazardous Waste Division

FROM: Leroy Vahovick, Lansing District, Hazardous Waste Division

SUBJECT: Facility Management Plan For Stanley Works, Stanley Tool Division

A review of current Hazardous Waste Division files, along with District Groundwater and Surface Water files, has revealed that past Industrial Waste Management practices at this facility have caused Groundwater contamination.

Four different areas were found to exist, that need further attention. These areas are rather well documented on the site map, as well as in reports by EPA, DNR and Company documents. See attached map and EPA report 1a and 1b.

1. The existing settling pond contains metal hydroxide sludges from their present industrial activities. These sludges are the result of the pretreatment of the industrial waste waters. The final effluent from these settling lagoons is discharged to the Red Cedar River under the NPDES Permit MI0003727. The Company is in the process of letting bids, for the removal of the sludge that is presently in the lagoons and for the closure of these lagoons.

   This closure should be carefully monitored by our staff.

2. The four old settling ponds (shown on the site map) were in existence prior to the construction of the existing settling ponds. The old ponds were not lined and analysis of the groundwater within the site boundaries have shown heavy metal contamination. The contaminated soils from the old settling ponds have been excavated and removed from the site. However, the potential for soil and groundwater contamination in this area does exist, because of uses made of the area in the past.

   The monitoring of wells situated near the old settling ponds should be carefully watched by the groundwater people and their recommendations carefully followed, should purging of these areas be needed.

3. Two locations exist, where sludges from the old settling ponds were treated by a chem fix process, whereby the metal hydroxide sludges were rendered a solid material and placed on the Company property. (see site map) The sludges that were placed in the northern most location, has been removed (near well 17). The other location situated west of the existing settling ponds and east of the Red Cedar River, appears to have an undetermined quantity of this material stored there.

   The sludge that remains in the location near the Red Cedar River, must be removed and both locations carefully monitored for groundwater contamination.

4. On September 16, 1985, I observed metal hydroxide sludge outside of the fence that surrounds the existing settling ponds (north of northeast corner 50 ft.). This sludge has been allowed to remain in this area for several years.

   This material must be removed and the groundwaters monitored.

Recommendations For This Site

A program must be developed by this Company, that address each of the areas discussed in this report. Groundwater contamination has been established and is well documented at this site. See 1d, 1e, 1f, 1g, 1h, 1i, 1j, 1k and 1l supporting documents.

Suggested Course of Action:

1. DNR staff determines the course of action to resolve this matter.

2. Have a meeting with industry and convey the suggested course of action necessary to cleanup this site.

LV/ms

Attachments

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

September 26, 1985

TO: James Roberts, Technical Services Section, Hazardous Waste Division

FROM: Leroy Vahovick, Lansing District, Hazardous Waste Division

SUBJECT: Facility Management Plan For Stanley Works, Stanley Tool Division

A review of current Hazardous Waste Division files, along with District Groundwater and Surface Water files, has revealed that past Industrial Waste Management practices at this facility have caused Groundwater contamination.

Four different areas were found to exist, that need further attention. These areas are rather well documented on the site map, as well as in reports by EPA, DNR and Company documents. See attached map and EPA report 1a and 1b.

1. The existing settling pond contains metal hydroxide sludges from their present industrial activities. These sludges are the result of the pretreatment of the industrial waste waters. The final effluent from these settling lagoons is discharged to the Red Cedar River under the NPDES Permit MI0003727. The Company is in the process of letting bids, for the removal of the sludge that is presently in the lagoons and for the closure of these lagoons.

   This closure should be carefully monitored by our staff.

2. The four old settling ponds (shown on the site map) were in existence prior to the construction of the existing settling ponds. The old ponds were not lined and analysis of the groundwater within the site boundaries have shown heavy metal contamination. The contaminated soils from the old settling ponds have been excavated and removed from the site. However, the potential for soil and groundwater contamination in this area does exist, because of uses made of the area in the past.

   The monitoring of wells situated near the old settling ponds should be carefully watched by the groundwater people and their recommendations carefully followed, should purging of these areas be needed.

3. Two locations exist, where sludges from the old settling ponds were treated by a chem fix process, whereby the metal hydroxide sludges were rendered a solid material and placed on the Company property. (see site map) The sludges that were placed in the northern most location, has been removed (near well 17). The other location situated west of the existing settling ponds and east of the Red Cedar River, appears to have an undetermined quantity of this material stored there.

   The sludge that remains in the location near the Red Cedar River, must be removed and both locations carefully monitored for groundwater contamination.

4. On September 16, 1985, I observed metal hydroxide sludge outside of the fence that surrounds the existing settling ponds (north of northeast corner 50 ft.). This sludge has been allowed to remain in this area for several years.

   This material must be removed and the groundwaters monitored.

Recommendations For This Site

A program must be developed by this Company, that address each of the areas discussed in this report. Groundwater contamination has been established and is well documented at this site. See 1d, 1e, 1f, 1g, 1h, 1i, 1j, 1k and 1l supporting documents.

Suggested Course of Action:

1. DNR staff determines the course of action to resolve this matter.

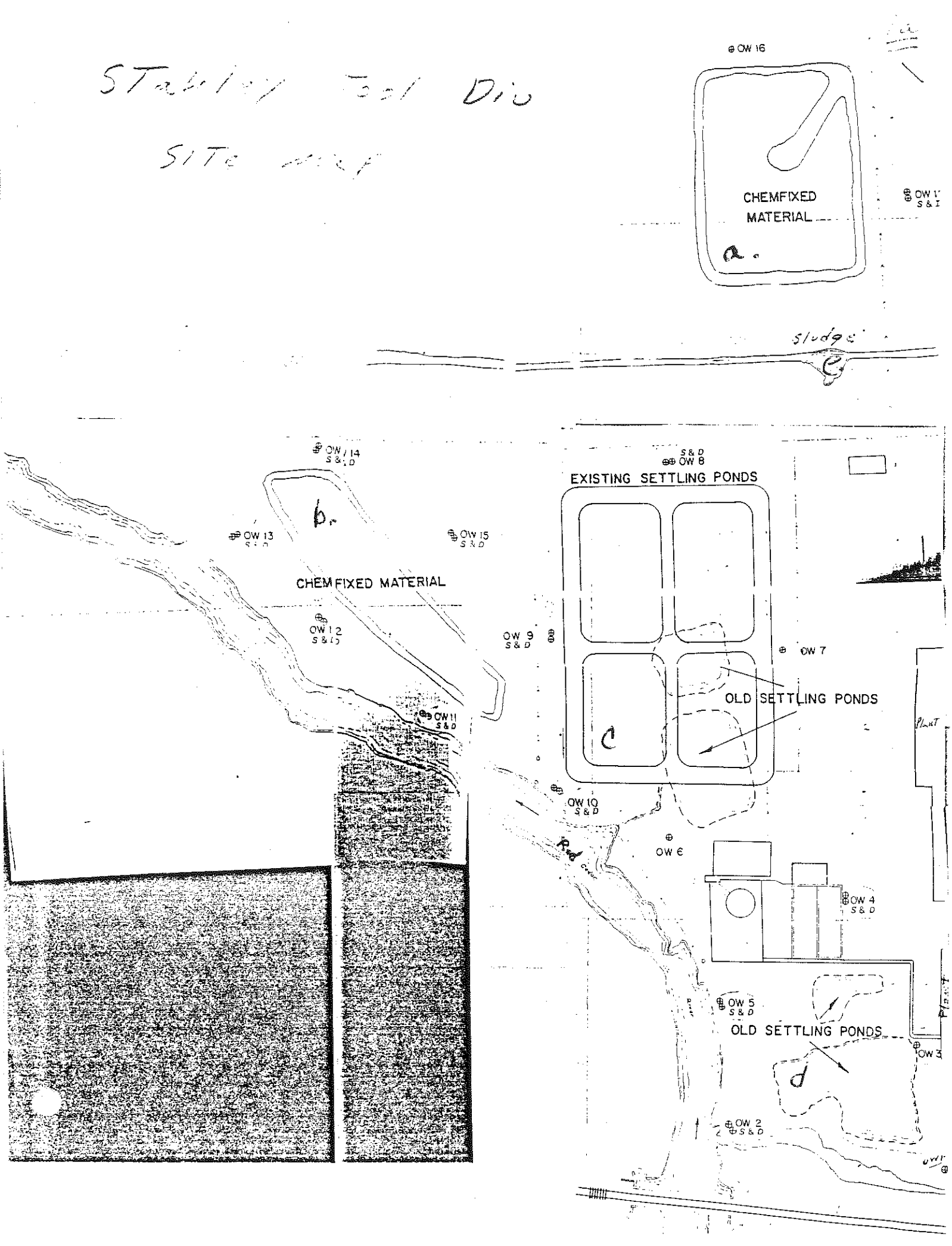
2. Have a meeting with industry and convey the suggested course of action necessary to cleanup this site.

LV/ms

Attachments

Stability Test Pit

Site Map



(Date of Draft: 6/6/

Attachment 20

Name of Preparer: Terry Vakovics
Date: 9/20/85

Model Facility Management Plan

1. Facility Name: Stanley Works, Stanley Tool Div

2. Facility I.D. Number: MID 099 124 050

3. Owner and/or Operator: Stanley Works Stanley Tool Div.

4. Facility Location: 425 Frank St.
Street Address

Fowlerville | | Mich | 48836
City | County | State | Zip Code

5. Facility Telephone (if available): (517) 223-9154

6. Interim Status or Permitted Hazardous Waste Units and Capacities of Each Unit:

	Type of Units	Years of Operation (indicate active or closed)	Size or Capacity
X	Storage in Tanks or Containers		3500 gal
____	Incinerator		
____	Landfill		
X	Surface Impoundment	active	
X	Waste Pile	inactive	
____	Land Treatment		

7. Interim Status or Permitted Hazardous Waste Process(es) and Capacities of Each

Type of Process	Years in Operation	Capacity
Settling lagoons	Prior To 1969	

8. Permit Application Status:
Initial Part B Submission Date: [illegible]
Completed Application Submission Date: _____
Notice of Deficiency Date(s): _____

9. Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Facility:

Type of Waste	Quantity	Generated, Treated, Stored or Disposed (note appropriate categories)
metal hydroxide sludge Cd Ni Zn Cr.	?	generated and stored

10. Date Questionaire Re Solid Waste Management Units sent out 8/21/85

11. Date response to Questionaire received May 13 - 24 1985

12. Review of Response indicates: (check one)

✓ Solid Waste Management Units exist (other than previously identified RCRA units)

_____ No Solid Waste Management Units exist (other than previously identified RCRA units)

_____ It is unclear from review of questionaire whether or not any solid Waste Management Units exist

_____ Respondent indicates that does not know if any Solid Waste Management Units exist

13. If the response to question 12 is that Solid Waste Management Units exist, than check one of the following:

✓ Releases of hazardous waste or constituents have occurred or are thought to have occurred

_____ Releases of hazardous waste or constituents have not occurred

_____ It is not known whether a release of hazardous waste or constituents has occurred

14. Description of All Available Monitoring Data for Facility:

Type of Data	Date	Author	Summary of Results or Conclusions
1a	2/3/84	Keck	[illegible]
1e	11/16/82	T Knapp	[illegible]
1g	10/11/83	Erg	well info + data

15. Description of Enforcement Status:

Type of Action	Date	Local, State or Federal	Result or Status
[illegible]			

16. Description of Any Complaints from Public:

Source of Complaint	Date	Recipient	Subject and Response
None		No Files	

17. Description of All Inspection Reports for Facility:

Date of Inspection	Inspector (Local, State, Federal)	Conclusions or Comments
9/ [illegible]	[illegible]	RCRA Violations
[illegible] 95	[illegible]	RCRA Violations - [illegible] Resolved
8-14-93	Hai Nguyen	[illegible] Compliance
7-7-92	Richard Rudge	Follow [illegible]

18. During inspection of this facility did the inspector note any evidence of past disposal practices not currently regulated under RCRA such as piles of waste or rubbish, ponds or surface impoundments that might contain waste or active or inactive landfills?

✓ Yes - give date if inspection and describe observation

9/16/95 Metal processing sludge dried 100' west of present lagoons. Deposits observed North of present lagoon. Just outside of fences.

_____ No

_____ Don't know

19. Do inspection reports indicate observations of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

✓ Yes - indicate date of report and describe observations

I observed discolored soils [illegible] North of [illegible] on 9/16/95 also North of [illegible] corner of lagoon fence [illegible]

_____ No

_____ Don't know

20. Do inspection reports indicate the presence of any tanks at the facility which are located below grade and could possibly leak without being noticed by visual observation?

______ Yes - date of inspection and describe information in report

____

____

____

__✓__ No

______ Don't know

21. Does a groundwater monitoring system exist at the facility? __yes__

22. If answer to question 18 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? __yes__

Explain - See Item 1C for a list of deficiencies [illegible] even though EPA has approved the g.w. assessment program

23. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? No - See March 25, [illegible] letter

If no, explain deficiency by Al Howard to Ms Edith Ardiente EPA. (attachment [illegible])

____

24. Decribe all information on facility subsurface geology or hydrogeology available.

Type of Information	Author	Date	Summary of Conclusions
[illegible] John Kraft memo [illegible]		11/10/82	[illegible] Conclusions [illegible] 1985

25. Did the facility submit a 103(c) notification pursuant to CERCLA?

✓ Yes Date of Notification _____

_____ No

26. If answer to 22 is yes, briefly summarize content of that notification. (waste management units identified, type of waste concerned)

27. Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this facility?

✓ Yes July 1985

_____ No

28. If answer to question 27 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contamination found, wastes and sources of contamination.

_____

_____

_____

_____

_____

29. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that:

_____ RCRA and CERCLA units are same at this facility

_____ RCRA and CERCLA units are clearly different units

_____ There is an overlap between the RCRA and CERCLA units (some are the same, some are different)

30. The facility is on the National Priorities List or a proposed update of the List

_____ Yes - indicate NPL or update

✓ No

31. Description of Any Past Releases or Environmental Contamination:

Type/Source of Release	Date	Material Released	Quantity	Response

[illegible] numerous releases and/or discharges [illegible]
to determine specific sources, dates, quantities [illegible]
[illegible] attachments 2 and 16.

32. Identification of Reports or Documentation Concerning Each Release Described in Item 14.

Title/Type of Report	Date	Author	Recipients	Contents

33. Highlight any information gaps in the file - describe any plans to obtain additional needed information.
[illegible] (attachment [illegible])

Recommendation for Regional Approach to the Facility: Rank in order of appropriateness for this Facility one through seven

______ Permit Compliance Schedule

______ Corrective Action Order (may include compliance schedule)

______ Other Administrative Enforcement

______ Judicial Enforcement

______ Referral to CERCLA for Federally Financed or Enforcement Activity

______ Voluntary/Negotiated Action

______ State Action

Brief narrative in explanation of selection of ranking: _____

_____

_____

_____

If Permit Alternative is Selected: Projected Schedule

Date of Part B Submission: July 23, 1984

Date of Completeness Check: _____

Date for Additional Submissions (if required): _____

Date of Completion of Technical Review: _____

Completion of Draft Permit/Permit Denial: _____

Public Notice for Permit Decision: _____

Date of Hearing (if appropriate): _____

Date for Final Permit or Denial Issuance: _____

Description of any corrective action provisions to be included in permit -

If Corrective Action Order Alternative is Selected:

Estimated Date for Order Issuance: _____

Description of Provisions of the Order to be Completed by Facility: _____

_____

_____

Description of Compliance Schedule to be Contained in Order:

_____

_____

_____

If Other Administrative Enforcement Action is Selected:

Projected Date for Issuance of the Order: _____

Description of Provisions of the Order: _____

_____

_____

If Judicial Enforcement Alternative Selected:

Date of Referral to Office of Regional Counsel: _____

If Referral to CERCLA for Action Selected:

Date of Referral to CERCLA Sections: _____

If Voluntary/Negotiated Action Alternative if Selected:

Date of Initial Contact with Facility: _____

Description of Goals of Contact or Discussions with Facility: _____

_____

_____

_____

Date for Termination of Discussions if Not Successful:

_____

Date of Finalization of Settlement if Negotiation Successful:

_____

If State Action Alternative is Selected:

Date for Referral to State: _____

State Contact: _____

LECOY 16

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D099124299

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Stanley Works, Stanley Tool Division	425 Frank Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Fowlerville	MI	48836	Livingston	93	6

09 COORDINATES: LATITUDE 42 39 35.0 | LONGITUDE 084 04 45.0

10 TYPE OF OWNERSHIP (Check one): [X] A. PRIVATE [ ] B. FEDERAL _____ [ ] C. STATE [ ] D. COUNTY [ ] E. MUNICIPAL [ ] F. OTHER _____ [ ] G. UNKNOWN

III. INSPECTION INFORMATION

01 DATE OF INSPECTION	02 SITE STATUS	03 YEARS OF OPERATION
5 29 84 (MONTH DAY YEAR)	[X] ACTIVE [ ] INACTIVE	1950 (BEGINNING YEAR) Present (ENDING YEAR) ___ UNKNOWN

04 AGENCY PERFORMING INSPECTION (Check all that apply)
[ ] A. EPA [X] B. EPA CONTRACTOR Ecology + Environment (Name of firm) [ ] C. MUNICIPAL [ ] D. MUNICIPAL CONTRACTOR _____ (Name of firm)
[ ] E. STATE [ ] F. STATE CONTRACTOR _____ (Name of firm) [ ] G. OTHER _____ (Specify)

05 CHIEF INSPECTOR	06 TITLE	07 ORGANIZATION	08 TELEPHONE NO
Margaret Burns	Geologist	E + E	(312) 663-9415
09 OTHER INSPECTORS	10 TITLE	11 ORGANIZATION	12 TELEPHONE NO
Tom Pachowicz	Earth Scientist	E + E	(312) 663-9415
			( )
			( )
			( )
			( )

13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15 ADDRESS	16 TELEPHONE NO
Mike Stock	Production Manager	425 Frank Street. Fowlerville, MI. 48836	(517) 223-9154
Delia Yorena	Chief Chemist	1309 Corbin Ave. New Britain, Ct. 06053	(203) 225-5111 x521
Reza Rejai	Chemist	425 Frank Street Fowlerville, MI. 48836	(517) 223-9154
			( )
			( )
			( )

17 ACCESS GAINED BY (Check one)	18 TIME OF INSPECTION	19 WEATHER CONDITIONS
[X] PERMISSION [ ] WARRANT	2:30 p.m.	60° cloudy; drizzle

IV. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NO
Don Josif	Region V U.S. EPA	(312) 886-0293
04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NO.**	**08 DATE**
Margaret Burns	U.S. EPA / E+E	Ecology + Environment	(312) 663-9415	7 10 84 (MONTH DAY YEAR)

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
MI	D099124299

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS – Present Waste Quantities; Past Quantities Unknown

01 PHYSICAL STATES (Check all that apply)

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☒ C. SLUDGE
- ☐ D. OTHER _____ (Specify)
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE
(Measures of waste quantities must be independent)

- TONS 24,570 T/y
- CUBIC YARDS _____
- NO. OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- ☒ A. TOXIC
- ☒ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☒ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	800	T/y	F006 - WWT Sludge from electroplating
OLW	OILY WASTE			
SOL	SOLVENTS	600	T/y	F007 - Spent stripping + cleaning bath solutions from electroplating
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS	500	T/y	D002 - Corrosive nonspecific
BAS	BASES			
MES	HEAVY METALS	22,670	T/y	D007 + F009 Chromium + Spent plating bath solutions from electroplating

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

RCRA Permit Application EPA Form 3570-1 (6-80)
On site inspection interview with site official - Mike Stack; on 5-29-84.
U.S. EPA Region V files

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D099124299

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 4650
02 [X] OBSERVED (DATE: 1976) [X] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

Past landfill and lagoon areas were not lined, spills of hazardous materials occured in the past, and analysis of groundwater within the site boundries have shown heavy metal contamination by Chromium. The potenial for off site contamination (in the future) exists for the ground waters in the area.

01 [X] B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 4650
02 [ ] OBSERVED (DATE:) [X] POTENTIAL [X] ALLEGED
04 NARRATIVE DESCRIPTION

The old lagoon area is located adjacent to the Red Cedar River. The groundwater flows towards the river and discharges into it. The site boarders the river and has already detected groundwater contamination in its monitoring wells. Therefore, the potential for contamination is high via discharge as well as runoff from the surface of the filled lagoon.

01 [ ] C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: N/A
02 [ ] OBSERVED (DATE:) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: N/A
02 [ ] OBSERVED (DATE:) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED:
02 [ ] OBSERVED (DATE:) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

Site is completely fenced at present - past conditions are not known.

01 [X] F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: 2 (Acres)
02 [X] OBSERVED (DATE: 1976) [X] POTENTIAL [X] ALLEGED
04 NARRATIVE DESCRIPTION

Soils contaminated by spills and fill areas were excavated in 1976 and landfilled onsite. The landfill was later excavated and waste was hauled offsite. A potential for soil contamination exsists in the old lagoon area and in the excavated landfill areas. Because of lack of vegetation growing over the lagoon it can be alleged that those soils are contaminated.

01 [X] G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 4650
02 [X] OBSERVED (DATE: 1976) [X] POTENTIAL [X] ALLEGED
04 NARRATIVE DESCRIPTION

See Ground Water Contamination above. There is chromium contamination in the groundwater onsite. However, the community drinking wells are finished in bedrock ~ 275 ft. deep. There are some private wells in the area that are finished in drift; These wells could become contaminated and possibly have already.

01 [ ] H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: N/A
02 [ ] OBSERVED (DATE:) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

01 [ ] I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: N/A
02 [ ] OBSERVED (DATE:) [ ] POTENTIAL [ ] ALLEGED
04 NARRATIVE DESCRIPTION

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D099124299

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 [X] J. DAMAGE TO FLORA — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [X] ALLEGED
04 NARRATIVE DESCRIPTION
See Soil Contamination. There is little or no vegetation growing in area of old lagoon.

01 [X] K. DAMAGE TO FAUNA — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
04 NARRATIVE DESCRIPTION (Include names of species)
See Surface Water contamination. Fish and other aquatic life could be contaminated if the Red Cedar River was to become contaminated from Runoff and groundwater discharge.

01 [X] L. CONTAMINATION OF FOOD CHAIN — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
04 NARRATIVE DESCRIPTION
See Damage to Fauna above. The potential for contamination of food chain exsists if people fishing in Red Cedar River eat contaminated fish.

01 [ ] M. UNSTABLE CONTAINMENT OF WASTES (Spills/Runoff/Standing liquids/Leaking drums) — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION
N/A

01 [ ] N. DAMAGE TO OFFSITE PROPERTY — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
04 NARRATIVE DESCRIPTION
N/A

01 [ ] O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
04 NARRATIVE DESCRIPTION
N/A

01 [ ] P. ILLEGAL/UNAUTHORIZED DUMPING — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
04 NARRATIVE DESCRIPTION
N/A

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS
N/A

III. TOTAL POPULATION (POTENTIALLY) AFFECTED: 4650

IV. COMMENTS
Most of the wells in the area of Fowlerville are in bedrock due to the poor aquifer quality of the glacial till. There are some private wells that are finished in the overburden and these wells could become contaminated. Information is not available concerning protection of bedrock aquifer from water-table aquifer and potential contaminates.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis reports)
Onsite interview with site official - Mike Stack; on 5-29-84.
U.S.G.S. Topo Quads: Fowlerville; Parkerscorners; Webberville - 7.5 min.
U.S. EPA Region V files.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	D099124299

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED (Check all that apply)	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
☒ A. NPDES	MI 0003727	1976	Jan. 1989	
☐ B. UIC				
☐ C. AIR				
☐ D. RCRA				
☒ E. RCRA INTERIM STATUS	MID099124299			
☐ F. SPCC PLAN				
☐ G. STATE (Specify)				
☐ H. LOCAL (Specify)				
☐ I. OTHER (Specify)				
☐ J. NONE				

III. SITE DESCRIPTION

01 STORAGE/DISPOSAL (Check all that apply)	02 AMOUNT	03 UNIT OF MEASURE
☒ A. SURFACE IMPOUNDMENT	660,000	gallons
☐ B. PILES		
☒ C. DRUMS, ABOVE GROUND	storage	
☒ D. TANK, ABOVE GROUND	629,600	gal/day
☐ E. TANK, BELOW GROUND		
☒ F. LANDFILL - Past	UNKNOWN	
☐ G. LANDFARM		
☐ H. OPEN DUMP		
☐ I. OTHER (Specify)		

04 TREATMENT (Check all that apply)

- ☐ A. INCINERATION
- ☐ B. UNDERGROUND INJECTION
- ☒ C. CHEMICAL/PHYSICAL
- ☐ D. BIOLOGICAL
- ☐ E. WASTE OIL PROCESSING
- ☐ F. SOLVENT RECOVERY
- ☐ G. OTHER RECYCLING/RECOVERY
- ☐ H. OTHER (Specify) Internal - Chromium

05 OTHER

☒ A. BUILDINGS ON SITE: 3

06 AREA OF SITE: 11.7 (Acres)

2 acres of past storage

07 COMMENTS

The site has 4 holding lagoons which are under RCRA interim status. Drums and tanks are used as temporary storage for wastes. In the past, there was a lagoon adjacent to the Red Cedar River and a landfill was used for plating sludges. The filled material was later excavated and hauled offsite.

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

☒ A. ADEQUATE, SECURE (Present) ☐ B. MODERATE ☒ C. INADEQUATE, POOR (Past) ☐ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.

Spcc - hydrolic oils are drummed and hauled off site. Drums of sludge are stored on site prior to being removed to a secure waste disposal site.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☐ YES ☒ NO

02 COMMENTS

Presently, this site is completely fenced - past practises are not known.

VI. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

Onsite interview with site official - Mike Stock et al., on 5-29-84

U.S. EPA Region II files

RCRA permit application; USEPA Form 3510-1 (6-80)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D009124299

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY (Check as applicable)	SURFACE	WELL
COMMUNITY	A. ☐	B. ☒
NON-COMMUNITY	C. ☐	D. ☒

02 STATUS	ENDANGERED	AFFECTED	MONITORED
	A. ☐	B. ☐	C. ☒
	D. ☐	E. ☐	F. ☐

03 DISTANCE TO SITE
A. 1/2 (mi)
B. 1/4 (mi)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY (Check one)

☒ A. ONLY SOURCE FOR DRINKING ☒ B. DRINKING (Other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (Two other water sources available) ☐ C. COMMERCIAL, INDUSTRIAL, IRRIGATION (Limited other sources available) ☐ D. NOT USED, UNUSEABLE

02 POPULATION SERVED BY GROUND WATER: 4650
03 DISTANCE TO NEAREST DRINKING WATER WELL: 1/4 (mi)

04 DEPTH TO GROUNDWATER	05 DIRECTION OF GROUNDWATER FLOW	06 DEPTH TO AQUIFER OF CONCERN	07 POTENTIAL YIELD OF AQUIFER	08 SOLE SOURCE AQUIFER
10 - 30 (ft)	West southwest	~ 70 (ft)	.637 (mgd) (gpm)	☐ YES ☒ NO

09 DESCRIPTION OF WELLS (Including useage, depth, and location relative to population and buildings)
The wells in the area are finished in bedrock. This is due to the poor aquifer quality of the glacial till overlying the bedrock. The community wells are about 275 feet deep and are located approx. ½ mi. due north of the site. There are a few shallow private wells in the area but most people are on community water. The site has one well ~ 280 feet deep that is used for production only.

10 RECHARGE AREA	COMMENTS
☐ YES ☐ NO	

11 DISCHARGE AREA	COMMENTS
☒ YES ☐ NO	The Red Cedar River is a discharge area for shallow groundwater but not for the aquifer in bedrock.

IV. SURFACE WATER

01 SURFACE WATER USE (Check one)

☒ A. RESERVOIR, RECREATION, DRINKING WATER SOURCE ☐ B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES ☐ C. COMMERCIAL, INDUSTRIAL ☐ D. NOT CURRENTLY USED

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME:	AFFECTED	DISTANCE TO SITE
Red Cedar River	☐	~100 ft
	☐	(mi)
	☐	(mi)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN

ONE (1) MILE OF SITE	TWO (2) MILES OF SITE	THREE (3) MILES OF SITE
A. 2460 NO. OF PERSONS	B. 3550 NO. OF PERSONS	C. 4650 NO. OF PERSONS

02 DISTANCE TO NEAREST POPULATION: .1 (mi)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE: 950
04 DISTANCE TO NEAREST OFF-SITE BUILDING: .1 (mi)

05 POPULATION WITHIN VICINITY OF SITE (Provide narrative description of nature of population within vicinity of site, e.g., rural, village, densely populated urban area)
The site is located in the Southwest corner of the City of Fowlerville. To the north-east (Fowlerville) is moderately populated, but to the west and south the area is rural and sparsely populated.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D009124299

VI. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

☐ A. 10^{-6} – 10^{-8} cm/sec ☐ B. 10^{-4} – 10^{-6} cm/sec ☒ C. 10^{-4} – 10^{-3} cm/sec ☐ D. GREATER THAN 10^{-3} cm/sec

02 PERMEABILITY OF BEDROCK (Check one)

☐ A. IMPERMEABLE (Less than 10^{-6} cm/sec) ☐ B. RELATIVELY IMPERMEABLE (10^{-4} – 10^{-6} cm/sec) ☒ C. RELATIVELY PERMEABLE (10^{-2} – 10^{-4} cm/sec) ☐ D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)

03 DEPTH TO BEDROCK	04 DEPTH OF CONTAMINATED SOIL ZONE	05 SOIL pH
70 (ft)	UNKNOWN (ft)	7.4 - 8.0

06 NET PRECIPITATION	07 ONE YEAR 24 HOUR RAINFALL	08 SLOPE: SITE SLOPE	DIRECTION OF SITE SLOPE	TERRAIN AVERAGE SLOPE
-2 (in)	2 (in)	3 %	West	3 %

09 FLOOD POTENTIAL
SITE IS IN 100 YEAR FLOODPLAIN

10
No ☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS (5 acre minimum)
ESTUARINE: A. _____ (mi)
OTHER: B. 1 (mi)

12 DISTANCE TO CRITICAL HABITAT (of endangered species)
>5 (mi)
ENDANGERED SPECIES: Indiana Bat

13 LAND USE IN VICINITY

DISTANCE TO: COMMERCIAL/INDUSTRIAL	RESIDENTIAL AREAS; NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES	AGRICULTURAL LANDS: PRIME AG LAND	AG LAND
A .1 (mi)	B .1 (mi)	C .25 (mi)	D. _____ (mi)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

The site is on the 100 year flood plain of the Red Cedar River and borders the river on the west. To the north and south of the site there are wetlands. The slope gradually rises to the east and the topography is that of slightly rolling hills with slopes of 3-7%. The wetlands follow the course of river and are wooded on both sides of the river.

VII. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

United States Dept. of Agr. Soil Survey of Livingston County, MI.
U.S. Dept. of Commerce, National Oceanic and Atmospheric Administration
Hydrogeologic Atlas of Michigan, Dept. of Geology, Western Michigan Univ., 1981
U.S.G.S. 7.5 Topo Quads: Fowlerville; Parkers Corners; W. Fowlerville
Water well record, for Walter Pretsch of Livingston County, Sec. 14 T3N, R3E; SW, SW, SW - Private Residence

EPA FORM 2070-13 (7-81)

Onsite interview with site officials Mike Stock et al; on 5-29-84
U.S. EPA Region II files.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 6 - SAMPLE AND FIELD INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	D099124299

II. SAMPLES TAKEN - None taken by FIT personnel

SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE
GROUNDWATER	groundwater samples	taken by Stanley wrks from monitoring wells onsite	
SURFACE WATER			
WASTE	4	samples from the 4 lagoons onsite. Analysis was done by Stanley Works - See file for results.	
AIR			
RUNOFF			
SPILL			
SOIL			
VEGETATION			
OTHER - outfalls	Sample results from plant outfalls taken for RCRA monthly monitoring.		

III. FIELD MEASUREMENTS TAKEN

01 TYPE	02 COMMENTS
NONE	

IV. PHOTOGRAPHS AND MAPS

01 TYPE ☐ GROUND ☐ AERIAL

02 IN CUSTODY OF _____ (Name of organization or individual)

03 MAPS ☒ YES ☐ NO

04 LOCATION OF MAPS: USGS Topo Quads - U.S. EPA Region I / Map of site layout - U.S. EPA Region I files.

V. OTHER FIELD DATA COLLECTED (Provide narrative description)

The company has provided copies of photographs of their facility - Region I files.
The company confirmed Chromium contamination of the groundwater onsite during the interview.

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

U.S. EPA Region I files
Onsite inspection with site officials Mike Stock et al; on 5-29-84

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D099124299

II. CURRENT OWNER(S)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
The Stanley Works		195 Lake Street		New Britain	CT	06050

PARENT COMPANY (If applicable)

08 NAME	09 D+B NUMBER	10 STREET ADDRESS (P.O. Box, RFD #, etc.)	11 SIC CODE	12 CITY	13 STATE	14 ZIP CODE

III. PREVIOUS OWNER(S) (List most recent first)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
Hoover Universal		825 Victorsway		Ann Arbor	MI	48104

IV. REALTY OWNER(S) (If applicable, list most recent first)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
The Stanley Works		195 Lake Street		New Britain	CT	06050

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

U.S. EPA Region I files
Onsite interview with site officials - Mike Stock et al., on 5-29-84
RCRA Permit Application EPA Form 3510-1 (6-80)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART B - OPERATOR INFORMATION

I. IDENTIFICATION

01 STATE: MI | 02 SITE NUMBER: D099124299

II. CURRENT OPERATOR (Provide if different from owner)

01 NAME: The Stanley Works
02 D+B NUMBER:
03 STREET ADDRESS (P.O. Box, RFD #, etc.): 425 Frank Street
04 SIC CODE:
05 CITY: Fowlerville
06 STATE: MI.
07 ZIP CODE: 48836
08 YEARS OF OPERATION: 1980-Present
09 NAME OF OWNER: The Stanley Works

OPERATOR'S PARENT COMPANY (If applicable)

10 NAME:
11 D+B NUMBER:
12 STREET ADDRESS (P.O. Box, RFD #, etc.):
13 SIC CODE:
14 CITY:
15 STATE:
16 ZIP CODE:

III. PREVIOUS OPERATOR(S) (List most recent first; provide only if different from owner)

01 NAME: Hoover Universal
02 D+B NUMBER:
03 STREET ADDRESS (P.O. Box, RFD #, etc.): 425 Frank Street
04 SIC CODE:
05 CITY: Fowlerville
06 STATE: MI
07 ZIP CODE: 48836
08 YEARS OF OPERATION:
09 NAME OF OWNER DURING THIS PERIOD: Utiler; Hoover Ball+Bearing; Hoover Universal.

PREVIOUS OPERATORS' PARENT COMPANIES (If applicable)

10 NAME:
11 D+B NUMBER:
12 STREET ADDRESS (P.O. Box, RFD #, etc.):
13 SIC CODE:
14 CITY:
15 STATE:
16 ZIP CODE:

01 NAME:
02 D+B NUMBER:
03 STREET ADDRESS (P.O. Box, RFD #, etc.):
04 SIC CODE:
05 CITY:
06 STATE:
07 ZIP CODE:
08 YEARS OF OPERATION:
09 NAME OF OWNER DURING THIS PERIOD:

10 NAME:
11 D+B NUMBER:
12 STREET ADDRESS (P.O. Box, RFD #, etc.):
13 SIC CODE:
14 CITY:
15 STATE:
16 ZIP CODE:

01 NAME:
02 D+B NUMBER:
03 STREET ADDRESS (P.O. Box, RFD #, etc.):
04 SIC CODE:
05 CITY:
06 STATE:
07 ZIP CODE:
08 YEARS OF OPERATION:
09 NAME OF OWNER DURING THIS PERIOD:

10 NAME:
11 D+B NUMBER:
12 STREET ADDRESS (P.O. Box, RFD #, etc.):
13 SIC CODE:
14 CITY:
15 STATE:
16 ZIP CODE:

IV. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

RCRA Permit Application EPA Form 3510-1 (6-80)
Onsite interview with site officials - Mike Stock et al, on 5-29-84
U.S. EPA Region V files.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D009124299

II. ON-SITE GENERATOR

01 NAME	02 D+B NUMBER
Stanley Works, Stanley Tools Div.	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
425 Frank Street	

05 CITY	06 STATE	07 ZIP CODE
Fowlerville	MI	48836

III. OFF-SITE GENERATOR(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE / 07 ZIP CODE	05 CITY	06 STATE / 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE / 07 ZIP CODE	05 CITY	06 STATE / 07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
CHEM-MET Services Inc.			
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
18552 Allen Road			
05 CITY	06 STATE / 07 ZIP CODE	05 CITY	06 STATE / 07 ZIP CODE
Wyandotte	MI / 48192		
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
Nelson Industrial Services			
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
12345 Schaefer Hwy			
05 CITY	06 STATE / 07 ZIP CODE	05 CITY	06 STATE / 07 ZIP CODE
Detroit	MI		

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

RCRA Permit Application EPA Form 3510-1 (6-80)
Onsite interview with site officials - Mike Stack et al; on 5-29-84
U.S. EPA Region II files.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION
01 STATE: MI | 02 SITE NUMBER: D009124299

II. PAST RESPONSE ACTIVITIES

01 ☐ A. WATER SUPPLY CLOSED | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ B. TEMPORARY WATER SUPPLY PROVIDED | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ C. PERMANENT WATER SUPPLY PROVIDED | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ D. SPILLED MATERIAL REMOVED | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☒ E. CONTAMINATED SOIL REMOVED | 02 DATE ~1979 | 03 AGENCY
04 DESCRIPTION Stanley Works removed contaminated soils and landfilled them on site - see below. MDNR instructed them to remove the soil from the fill and haul it to a waste disposal facility.

01 ☐ F. WASTE REPACKAGED | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☒ G. WASTE DISPOSED ELSEWHERE | 02 DATE ~1981 | 03 AGENCY MDNR
04 DESCRIPTION Contaminated soils on the facility was originally landfill onsite and then later the MDNR ordered Stanley works to remove the fill and ship it to a qualified landfill facility.

01 ☒ H. ON SITE BURIAL | 02 DATE | 03 AGENCY
04 DESCRIPTION See above They originally buried contaminated soil on site but were instructed later by the MDNR to remove the material.

01 ☐ I. IN SITU CHEMICAL TREATMENT | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ J. IN SITU BIOLOGICAL TREATMENT | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ K. IN SITU PHYSICAL TREATMENT | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ L. ENCAPSULATION | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ M. EMERGENCY WASTE TREATMENT | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ N. CUTOFF WALLS | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ O. EMERGENCY DIKING/SURFACE WATER DIVERSION | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ P. CUTOFF TRENCHES/SUMP | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

01 ☐ Q. SUBSURFACE CUTOFF WALL | 02 DATE | 03 AGENCY
04 DESCRIPTION N/A

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	D099124299

II PAST RESPONSE ACTIVITIES (Continued)

01 ☐ R. BARRIER WALLS CONSTRUCTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ S. CAPPING/COVERING — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ T. BULK TANKAGE REPAIRED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ U. GROUT CURTAIN CONSTRUCTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ V. BOTTOM SEALED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ W. GAS CONTROL — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ X. FIRE CONTROL — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ Y. LEACHATE TREATMENT — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ Z. AREA EVACUATED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ 1. ACCESS TO SITE RESTRICTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ 2. POPULATION RELOCATED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

01 ☐ 3. OTHER REMEDIAL ACTIVITIES — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION N/A

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

On site interview with site officials - Mike Stock et al; on 5-29-84.
U.S. EPA Region II files.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
MI	D099124299

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION ☐ YES ☒ NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

III. SOURCES OF INFORMATION *(Cite specific references, e.g., state files, sample analysis reports)*

KECK consulting services, inc.
1099 W. GRAND RIVER · WILLIAMSTON, MI 48895 · (517) 655-4391

1d

February 3, 1984

Quarterly Results - October, 1983
Groundwater Quality Assessment Program
Stanley Tools
Fowlerville, Michigan

Table: 1. Monitor/Observation Well Information

Appendices: A. Field Methodology

B. Analytical Report

C. Statistical Analysis

INTRODUCTION

On August 16, 1983 a Groundwater Quality Assessment Program was prepared in accordance with CFR 40, Subpart F, paragraph 265.93 (d) (2) for the Stanley Tool facilities located in Fowlerville, Michigan. Results from the first year quarterly sampling program indicated the occurrence of groundwater contamination in the three down-gradient monitor wells. Specifically, Well #5 showed significant groundwater contamination for both the pH and total organic halogens - chloride parameters, Well #10 for pH and Well #12 for total organic carbon and pH. The water quality results and the Groundwater Quality Assessment Plan were submitted to the EPA Regional Administrator.

The Groundwater Quality Assessment Plan made recommendations as to modifications in sampling procedures, proposing the addition of one up-gradient well and three down-gradient wells to supplement the existing wells. In addition, two sampling locations were established upstream and downstream on the adjacent Red Cedar River so as to monitor any water quality impact on the river. A staff gauge was also installed within the river in order to assess influent or effluent conditions between the monitored aquifer and the river.

It was proposed to monitor all eight wells plus the two river stations on a quarterly basis for the Indicator parameters

which include pH, TOH, TOC and Specific Conductance. To date all of the recommendations of the Groundwater Quality Assessment Plant have been implemented.

The first set of quarterly samples were collected in October, 1983 by Environmental Research Group (ERG) of Ann Arbor, Michigan. The sampling procedures and an account of events are contained in Appendix A. Appendix B presents the analytical results for the quarter as prepared by ERG. The statistical analyses of the first quarter results were prepared by Keck Consulting Services, Inc. and are shown in Appendix C. Table 1 lists groundwater elevations at the time of sampling. No sample was collected from OW-2s as it was found to be clogged. This well has since been repaired.

DISCUSSION OF RESULTS

Appendix C contains the results of the statistical analyses of the quarterly water quality samples. Regarding the pH parameter Wells 1, 5, 9 and 10 all show a significant increase when compared to the first year's results from MW-7, the up-gradient well. Wells 11 and 12, on the other hand, both show a significant decrease. Note that the pH values vary from a high of 9.40 recorded at MW-1, a new up-gradient well, down to 7.40 at both MW-11 and MW-12 with MW-11 being a newly added down-gradient well. The river exhibited a pH of 8.10 at both sampling locations.

These results give the impression that groundwater contamination is occurring. However, an alternative conclusion is that the samples are derived from groundwater having very different histories in terms of source and travel path to the wells. Well 7, for example, is our up-gradient well to which all other wells are to be compared and displays an average pH of about 8.17. Yet Well 7 is installed within less permeable soils than the other wells. Note also, from Table 1, that wells 11 and 12 displayed static water levels that were below the elevation of the adjacent Red Cedar River. This implies that these wells were being recharged, at least partially, from the river at the time of sampling. The resulting water quality results are likely to depict a mixture of river water and groundwater quality. We would conclude that the pH parameter is telling us very little about degradation of groundwater.

I agree

I agree

In any event, our primary concern is for protection of the quality of the water in the Red Cedar River since we have shown that flow from the monitored aquifer discharges into the Red Cedar on-site. Thus, no private or public wells could possibly intercept the groundwater prior to its reaching the river. The water quality results from both upstream and downstream sources within the Red Cedar show no evidence of contamination based upon the pH values or any other parameter.

It diluted
so won't be as contaminant sensitive

The tests for specific conductance indicate no contamination of groundwater. The same holds true for both total organic iodine and bromide. Of the remaining parameters tested Well 12 shows an increase of total organic carbon, as it did last year, and Well 5 shows an increase of total organic chloride, again, as demonstrated previously. None of the Red Cedar River samples show significant increases or decreases for any of the tested parameters.

We would conclude that, other than for the pH parameter for which a number of alternative explanations arise, there is very little indication of any significant groundwater contamination. B.S.! The Red Cedar River into which the groundwater discharges shows no evidence of contamination emanating from the Stanley tools site. B.S.

It is our recommendation to continue the quarterly sampling and testing for the indicator parameters on a quarterly basis. These results will be evaluated and summarized in the next quarterly report.

Should questions or comments arise, please contact our office.

Respectfully submitted,

KECK CONSULTING SERVICES, INC.

George Henry, Jr.

George Henry, Jr.
Certified Professional Geologist

STANLEY

THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

May 24, 1985

RECEIVED
MAY 28 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

Mr. Richard Traub
EPA Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Dear Mr. Traub:

Enclosed please find the potential release information as promised in my May 13,1985 letter. If you need additional information , please let me know.

Sincerely yours,

Delia M Christensen

Delia M. Christensen
Chief Chemist - Environmental Science

RECEIVED
MAY 28 1985
WMD-RAIU
EPA, REGION V

COPY 2

223-96

CERTIFICATI[illegible] REGARDING POTENTIAL RELEASES FROM
S[illegible]ID WASTE MANAGEMENT UNITS

FACILITY NAME: Stanley Tools

EPA I.D. NUMBER: MID 099 124 299

LOCATION CITY: Fowlerville

STATE: Michigan

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	YES	NO
• Landfill		
• Surface Impoundment	X	
• Land Farm		
• Waste Pile	X	
• Incinerator	X	
• Storage Tank (Above Ground)	X	
• Storage Tank (Underground)		
• Container Storage Area	X	
• Injection Wells		
• Wastewater Treatment Units	X	
• Transfer Stations		
• Waste Recycling Operations	X	
• Waste Treatment, Detoxification		
• Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if avaliable.

PLEASE SEE ATTACHMENT A AND B.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII Of 40 CFR Part 261.

COPY 2

3. For the units noted in Number 1 above and also those hazardous wasteunits in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the part or still be occurring.

Please provide the following information

a. Date of release
b. Type of waste released .
c. Quantity or volume of waste released
d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

To our knowledge, we have no documented releases from any of the identified solid waste units identified in Number 1. However, analytical data is provided in Question 4 for areas of possible contamination.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases, Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

SEE ATTACHMENT C

In accordance with applicable 40CFR requirements, we have previously supplied groundwater monitoring data to your department. If you need additional copies, please let me know.

1 certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. 1 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Robert A. Macfarlane Secretary and Associate General Counsel
Typed Name and Title

Signature

May 23 1985
Date

ATTACHMENT B

Question 2. Description of items in #1

Surface Impoundments

These areas are indicated on the attached site map as A, B, C & D.

A/B. To the best of our knowledge, prior to 1969, Hoover Universal (previous site owner) utilized these settling ponds for the storage of a Kerosene emulsion cleaner.

C/D. To the best of our knowledge, prior to 1969, Hoover Universal (previous site owner) utilized these settling ponds for the storage of treated Metal finishing wastewater similar in character to EPA Hazardous Waste F006.

Waste Piles

These areas are indicated on the attached site map as Area 1 and 2.

1. To the best of our knowledge, this area received material from surface impoundments A, B, C, and D during 1969.

2. To the best of our knowledge, this area received material from the existing four surface impoundments (indicated on site map as E,F,G,H) currently covered on Part B.

   Material solidified and chemically fixated by Hoover Universal during the period 1971-1972.

Incinerator

This unit handles normal plant trash which includes paper, cardboard and wood.

Storage Tank

One 7500 gallon tank (indicated on site map) used for storage of Waste Water soluble synthetic oil (glycol) based fluid.

Container Storage Area

A 15 x 15 ft. structure is utilized for container storage for 55 gallon drums of either virgin material or hazardous waste.

Wastewater Tratment System
Described in Attachment B

Waste Recycling Operations

A Chromium Recovery System (Chrome-Napper) is located internal to the plant and recycles chromium plating solution to the manufacturing process.

FACILITY DESCRIPTION
STANLEY TOOLS
DIVISION OF THE STANLEY WORKS
FOWLERVILLE, MICHIGAN
SEPTEMBER, 1984
REVISION NO. 1

The oxidation of cyanide occurs in three cyanide treatment tanks to the west of the facility. These tanks are contiguous, above-ground, fiberglass lined, open concrete block tanks operated in parallel. Treatment is accomplished on a fill-and-draw basis. Caustic soda is added for pH adjustment, sodium hypochlorite is added to oxidize the cyanide, sodium bisulfite is added for treatment of residual chlorine. Sodium hydrosulfite is added for reduction of chromium calcium chloride, ferrous sulfate and aluminum sulfate are added for treatment of copper and finally a polyelectrolyte is added to aid precipitation of metal hydroxides. Sodium hypochlorite is added from a welded steel tank supported above the first of the tanks. After treatment, the wastewater is pumped to the clarifier.

The clarifier is a circular steel plate tank. Lime, caustic soda, and a polyelectrolyte are added to the incoming wastewater in a primary mixing chamber at the center of the clarifier. Overflow from the clarifier drains to the neutralization basin. Underflow drains to a sludge sump, and is pumped to surface impoundment #1.

The neutralization basin is a small below-ground concrete tank. This basin receives wastewater from the clarifier and the neutralization sump. Sodium hydrosulfite, sodium hydroxide and polymers are added as necessary for pH adjustment and to improve the settling characteristics of the wastewater. The wastewater from the neutralization basin drains by gravity to surface impoundment #3.

The sludge sump is located adjacent to the neutralization basin and is a below-ground concrete tank. Sludge is pumped from the sump to surface impoundment #1 by a level-activated pump. No treatment is provided in the sump.

Attachment C

STANLEY

THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

February 11, 1985

Stanley Tools - Fowlerville Plant
Soil Borings - January 12, 1985
Swanson Environmental

Boring No.	Depth ft.	PCB's ppm	EP Toxicity mg/l Cr	Cu	Zn	Ni	Kerosene mg/kg
9	0 - 1	<1	<0.05	0.08	3.32	0.22	<80
	1 - 4	10	<0.05	0.8	33.94	1.03	75
	4 - 6	<1	<0.05	0.06	1.18	0.16	<50
10	0 - 1	1.7	<0.05	1.23	21.38	0.64	60
	1 - 3	6.9	<0.05	1.49	109.2	1.77	58
	3 - 5	<1	<0.05	0.05	1.6	0.12	<50
	5 - 7		<0.05	0.09	0.45	0.12	54
	7 - 8.5		<0.05	0.06	0.1	0.15	<50
11	0 - 2	1.3	<0.05	0.08	19.94	0.11	<50
	2 - 4	<1	<0.05	0.05	19.3	0.3	<50
12	0 - 2	<1	<0.05	0.28	26.84	0.24	89
	2 - 4	<1	<0.05	<0.02	6.52	0.08	940
	4 - 6	<1	<0.05	0.24	25.9	0.31	260
	6 - 8	<1	<0.05	0.03	0.56	0.14	<50
	8 - 9.5	<1	<0.05	0.07	0.11	0.17	<50

ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.
117 N. FIRST
ANN ARBOR, MICHIGAN 48104 (313) 662-8154

PROJECT LIPO
REPORT DATE 08-04-83

CLIENT P.O.: 82-2451
REPORT: 2379

SAMPLES RECVD. 07-19-83
REFER TECHNICAL QUESTIONS
TO: JACK SHEETS

CLIENT:
STANLEY TOOLS
425 FRANK STREET
FOWLERVILLE, MI 48836

APPROVED: James J. Boyer

ATTENTION: MIKE STOCK

***
RESIDUAL SAMPLES WILL
BE HELD FOR TWO WEEKS
***

CLIENT I.D.: WELL #5
ERG SAMPLE NO. 07/0922-4
MATRIX: GROUND WATER

PARAMETER	RESULTS	UNITS
pH, FIELD	7.95	S.U.
HALOSCAN - T		
ORGANIC CHLORIDE	0.46	mg/L
ORGANIC BROMIDE	ND (0.002)	mg/L
ORGANIC IODINE	*	mg/L
COMMENTS: * IODINE RESULTS TEMPORARILY HELD BY QUALITY CONTROL DUE TO LOW LEVEL DETECTION APPROXIMATING THE DETECTION LIMIT		
VOLATILE FRACTION (PRIOR. POLLS. EPA METH 624)		
ACROLEIN	ND (0.002)	mg/L
ACRYLONITRILE	ND (0.002)	mg/L
BENZENE	0.002	mg/L
BROMODICHLOROMETHANE	ND (0.002)	mg/L
BROMOFORM	ND (0.002)	mg/L
BROMOMETHANE	ND (0.002)	mg/L
CARBON TETRACHLORIDE	ND (0.002)	mg/L
CHLOROBENZENE	ND (0.002)	mg/L
CHLOROETHANE	ND (0.002)	mg/L
CHLOROETHYLVINYLETHER, 2	ND (0.002)	mg/L
CHLOROFORM	ND (0.002)	mg/L
CHLOROMETHANE	ND (0.002)	mg/L
CIS-1,3-DICHLOROPROPENE	ND (0.002)	mg/L
DIBROMOCHLOROMETHANE	ND (0.002)	mg/L
DICHLOROETHANE, 1,1-	0.042	mg/L
DICHLOROETHANE, 1,2-	ND (0.002)	mg/L
DICHLOROETHENE, 1,1-	ND (0.002)	mg/L
DICHLOROPROPANE, 1,2-	ND (0.002)	mg/L
ETHYLBENZENE	ND (0.002)	mg/L
METHYLENE CHLORIDE	ND (0.002)	mg/L
TETRACHLOROETHANE, 1,1,2,2-	ND (0.002)	mg/L

CONTINUED

ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

ERG PROJECT NO. 1190 - STANLEY TOOLS 08-04-83

CLIENT I.D.: WELL #5
ERG SAMPLE NO: 07/093824
MATRIX: GROUND WATER

PARAMETER	RESULTS	UNITS
TETRACHLOROETHENE	ND (0.002)	mg/L
TOLUENE	<0.002	mg/L
TRANS-1,3-DICHLOROPROPENE	ND (0.002)	mg/L
TRANS-1,2-DICHLOROETHYLENE	0.69	mg/L
TRICHLOROETHANE, 1,1,1-	ND (0.002)	mg/L
TRICHLOROETHANE, 1,1,2-	ND (0.002)	mg/L
TRICHLOROETHENE	0.17	mg/L
TRICHLOROFLUOROMETHANE	ND (0.002)	mg/L
VINYL CHLORIDE	0.18	mg/L
PCB		
TOTAL PCB	ND (0.20)	ug/L
PCB 1242	ND (0.20)	ug/L
PCB 1248	ND (0.20)	ug/L
PCB 1254	ND (0.20)	ug/L
PCB 1260	ND (0.20)	ug/L
ACID FRACTION (PRIOR POLLS METH 625)		
CHLOROPHENOL, 2-	ND (0.002)	mg/L
NITROPHENOL, 2-	ND (0.002)	mg/L
PHENOL	ND (0.002)	mg/L
DIMETHYLPHENOL, 2,4-	0.004	mg/L
DICHLOROPHENOL, 2,4-	ND (0.002)	mg/L
TRICHLOROPHENOL, 2,4,6-	ND (0.002)	mg/L
CHLORO-3-METHYLPHENOL, 4-	ND (0.002)	mg/L
DINITROPHENOL, 2,4-	ND (0.002)	mg/L
METHYL-4,6-DINITROPHENOL, 2-	ND (0.002)	mg/L
PENTACHLOROPHENOL	ND (0.002)	mg/L
NITROPHENOL, 4-	ND (0.002)	mg/L
B/N FRACTION (PRIOR POLLS METH 625)		
ACENAPTHENE	ND (0.002)	mg/L
ACENAPTHYLENE	ND (0.002)	mg/L
ANTHRACENE	ND (0.002)	mg/L
BENZIDINE	ND (0.002)	mg/L
BENZO(A)ANTHRACENE	ND (0.002)	mg/L
BENZO(A)PYRENE	ND (0.002)	mg/L
BENZO(B)FLUORANTHENE	ND (0.002)	mg/L
BENZO(K)FLUORANTHENE	ND (0.002)	mg/L
BENZO(G,H,I)PERYLENE	ND (0.002)	mg/L
BIS(2-CHLOROETHYL)ETHER	ND (0.002)	mg/L
BIS(2-CHLOROETHOXY)METHANE	ND (0.002)	mg/L
BIS(2-CHLOROISOPROPYL)ETHER	ND (0.002)	mg/L
BIS(2-ETHYLHEXYL)PHTHALATE	0.008	mg/L
BROMOPHENYL PHENYL ETHER, 4-	ND (0.002)	mg/L
BUTYL BENZYL PHTHALATE	ND (0.002)	mg/L

CONTINUED

ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

ERG PROJECT NO. 1170 - STANLEY TOOLS 06-04-83

CLIENT I.D. : WELL #5
ERG SAMPLE NO. 07A0P58824
MATRIX: GROUND WATER

PARAMETER	RESULTS	UNITS
CHLORONAPHTHALENE, 2-	ND (0.002)	mg/L
CHLOROPHENYL PHENYL ETHER, 4-	ND (0.002)	mg/L
CHRYSENE	ND (0.002)	mg/L
DI-N-BUTYLPHTHALATE	ND (0.002)	mg/L
DIBENZO(A,H)ANTHRACENE	ND (0.002)	mg/L
DICHLOROBENZENE, 1,2-	ND (0.002)	mg/L
DICHLOROBENZENE, 1,3-	ND (0.002)	mg/L
DICHLOROBENZENE, 1,4-	ND (0.002)	mg/L
DICHLOROBENZIDINE, 3,3'-	ND (0.002)	mg/L
DIETHYLPHTHALATE	ND (0.002)	mg/L
DIMETHYLPHTHALATE	ND (0.002)	mg/L
DINITROTOLUENE 2,4-	ND (0.002)	mg/L
DINITROTOLUENE 2,6-	ND (0.002)	mg/L
DIOCTYLPHTHALATE	ND (0.002)	mg/L
DIPHENYLHYDRAZINE 1,2-	ND (0.002)	mg/L
FLUORANTHENE	ND (0.002)	mg/L
FLUORENE	ND (0.002)	mg/L
HEXACHLOROBENZENE	ND (0.002)	mg/L
HEXACHLOROBUTADIENE	ND (0.002)	mg/L
HEXACHLOROCYCLOPENTADIENE	ND (0.002)	mg/L
HEXACHLOROETHANE	ND (0.002)	mg/L
INDENO(1,2,3-CD)PYRENE	ND (0.002)	mg/L
ISOPHORONE	ND (0.002)	mg/L
N-NITROSODI-N-PROPYLAMINE	ND (0.002)	mg/L
N-NITROSODIMETHYLAMINE	ND (0.002)	mg/L
N-NITROSODIPHENYLAMINE	ND (0.002)	mg/L
NAPHTHALENE	ND (0.002)	mg/L
NITROBENZENE	ND (0.002)	mg/L
PHENANTHRENE	ND (0.002)	mg/L
PYRENE	ND (0.002)	mg/L
TETRACHLORODIBENZO-P-DIOXIN	ND (0.002)	mg/L
TRICHLOROBENZENE, 1,2,4-	ND (0.002)	mg/L

CLIENT I.D. : WELL #10
ERG SAMPLE NO. 07A0P58825
MATRIX: GROUND WATER

PARAMETER	RESULTS	UNITS
pH, FIELD	7.90	S.U.

 SEE LAST PAGE FOR EXPLANATION OF SYMBOLS CONTINUED

ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

ERG PROJECT NO. 1170 - STANLEY TOOLS 08-04-83

CLIENT I.D.: WELL #13
ERG SAMPLE NO: 07/0932836
MATRIX: GROUND WATER

PARAMETER	RESULTS	UNITS
pH, FIELD.	6.60	S.U.
CARBON, TOTAL ORGANIC.	99	mg/L

FR - SEE FIELD REPORT FOR RESULT
NA - NOT APPLICABLE TO TEST REQUESTED
ND - NONDETECTED, DETECTION LIMIT (IF G)
SD - SAMPLE DAMAGED
SR - SEE ATTACHED REPORT FOR RESULT
< - POSITIVE RESULT BUT AT UNQUANTIFIABLE CONCENTRATION BELOW INDICATED LEVEL

THANK YOU FOR YOUR BUSINESS !

STANLEY

THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

May 13, 1985

Mr. Richard Traub
EPA Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Dear Mr. Traub:

Enclosed please find the potential release form for Stanley Tools, Fowlerville, Mi., (EPA ID #MID 099 124 299).

As we discussed I have completed the checklist. The remainder of the form will be submitted by May 24, 1985. This will allow us adequate review time for preparation of the material. Thank you for the extension.

Sincerely yours,

Delia M Christensen

as

Delia M. Christensen
Chief Chemist-Environmental Science
The Stanley Works
Stanley Laboratory
1309 Corbin Avenue
New Britain, Connecticut 06053

223-95